

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FORMER BL STORES, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: Docket No. 3260

**CERTIFICATE OF NO OBJECTION REGARDING TWELFTH MONTHLY FEE
APPLICATION OF MCDERMOTT WILL & SCHULTE LLP, COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025**

[NO ORDER REQUIRED]

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or other responsive pleading to the *Twelfth Monthly Fee Application of McDermott Will & Schulte LLP, Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2025 Through September 30, 2025* [Docket No. 3260] (the “Application”) filed on October 24, 2025. Objections to the Application were to be filed and served no later than November 14, 2025 at 4:00 p.m. (prevailing Eastern Time). The undersigned further certifies that he has reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Application appears thereon.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Former BL Stores, Inc. (9097); Former Management Stores of Ohio, LLC (7948); Consolidated Property Holdings, LLC (0984); Former Furniture Stores of Ohio, LLC (7868); Former Savings Stores of California, LLC (5262); Former Stores of Ohio, LLC (6811); Former Tenant Stores of Ohio, LLC (0552); Former Savings Stores of Ohio, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Former eCommerce Stores of Ohio, LLC (9612); and Former Low Cost Stores of Ohio, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 519], the Debtors are authorized to pay McDermott Will & Schulte LLP 80% of the fees, or \$145,093.20 and 100% of the expenses, or \$0.00, requested in the Application upon the filing of this certification and without the need for entry of a Court order approving the Application.

[Remainder of Page Intentionally Left Blank]

Dated: November 17, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)
Stacy L. Newman (No. 5044)
Jack M. Dougherty (No. 6784)
500 Delaware Avenue, Suite 600
Wilmington, DE 19801
Tel: (302) 652-3131
Fax: (302) 652-3117
Email: jalberto@coleschotz.com
snewman@coleschotz.com
jdougherty@coleschotz.com

-and-

Sarah A. Carnes (admitted *pro hac vice*)
1325 Avenue of the Americas, 19th Floor
New York, NY 10019
Tel: (212) 752-8000
Fax: (212) 752-8393
Email: scarnes@coleschotz.com

-and-

McDERMOTT WILL & SCHULTE LLP

Darren Azman (admitted *pro hac vice*)
Kristin K. Going (admitted *pro hac vice*)
Stacy Lutkus (admitted *pro hac vice*)
Natalie Rowles (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, NY 10017
Tel: (212) 547-5400
Fax: (212) 547-5444
Email: dazman@mwe.com
kgoing@mwe.com
salutkus@mwe.com
nrowles@mwe.com

*Counsel to the Official Committee of
Unsecured Creditors*